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March 1, 2021

BY ECF

The Honorable Alison J. Nathan
 United States District Court
 Southern District of New York
 United States Courthouse
 40 Foley Square
 New York, NY 10007

Re: *United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)*

Dear Judge Nathan:

We write on behalf of our client, Ghislaine Maxwell, to respectfully request a 10-day extension of time until Monday, March 15, 2021 to file our reply to the Government's Omnibus Memorandum in Opposition to the Defendant's Pre-trial Motions. We have conferred with the government, which has consented to the requested extension.

The requested extension is necessary because the government filed a lengthy response that included multiple exhibits and produced additional discovery that pertains to the motion response, all of which we will need time to review, analyze and discuss with our client. It will take several days for Ms. Maxwell to receive copies of these materials in the MDC. It will not be feasible for her to receive and review these lengthy materials, discuss them with counsel, and then read and provide comments on the draft replies in a week's time.

Under the Court's original briefing schedule, the defendant's pretrial motions were due on December 21, 2020, the government's response was due January 22, 2021, and the defendant's reply was due on February 5, 2021. (Dkt. 25). The Court agreed to move those deadlines by three weeks because the government needed additional time to finish producing discovery. (Dkt. 72). Under the revised briefing schedule, the defendant's pretrial motions were due on January 11, 2020, the government's response was due February 12, 2021, and the defendant's reply was due on February 19, 2021. (*Id.*). On January 5, 2021, at the defense's request and with the consent of the government, the Court agreed to modify the briefing schedule and set the current deadlines: the defendant's pretrial motions were due on January 25, 2021, the government's response was due February 26, 2021, and the defendant's reply is due on March 5, 2021. (Dkt. 108).

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We now respectfully request that the deadline for filing the defendant's reply be moved to **Monday, March 15, 2021**. The next scheduled appearance before the Court is the first day of trial on July 12, 2021.

Sincerely,

/s/ Christian Everdell
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cc: All Counsel of Record (By ECF)